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Attorneys for Defendants
PRIME ASCOT, L.P.; PRIME ASCOT
ACQUISITION, LLC; PRIME/PARK LABREA
TITLEHOLDER, LLC; and PRIME
ADMINISTRATION, LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

NICHA LEASER, ATCHARA WONGSAROJ,
KATINA MAGEE, and JOYCE EISMAN,
individually, and on behalf of others similarly
situated,

Plaintiffs,

v.

PRIME ASCOT, L.P., a California limited
partnership; PRIME ASCOT ACQUISITION,
LLC, a Delaware limited liability company;
PRIME/PARK LABREA TITLEHOLDER,
LLC, a Delaware limited liability company
(originally sued as Doe 1); PRIME
ADMINISTRATION, LLC, a Delaware limited
liability company; and Does 31 through 50,
inclusive,

Defendants.

Case No. 2:20-CV-02502-DJC-AC

**STIPULATION AND ORDER TO
MODIFY SCHEDULING ORDER**

District Judge Daniel J. Calabretta
Courtroom 10, 13th Floor

Trial Date: not set

1 Plaintiffs NICHIA LEASER, ATCHARA WONGSAROJ, KATINA MAGEE and JOYCE
2 EISMAN (collectively, "Plaintiffs") and Defendants PRIME ASCOT, L.P., PRIME ASCOT
3 ACQUISITION, LLC, PRIME/PARK LABREA TITLEHOLDER, LLC, PRIME
4 ADMINISTRATION, LLC (collectively, "Defendants," and together with Plaintiffs, the
5 "Parties"), by and through their respective counsel of record, hereby stipulate as follows:

6 WHEREAS, the Parties filed a Joint Notice Of Settlement And Request To Vacate
7 Scheduling Order And Set Hearing On Joint Motion For Preliminary Approval on October 10,
8 2025 (ECF No. 106);

9 WHEREAS, the Court vacated the previous scheduling order (ECF No. 104) and issued a
10 scheduling order on October 14, 2024 (ECF No. 107) (the "Scheduling Order");

11 WHEREAS, under the Scheduling Order, the deadline for the Parties to file their Joint
12 Motion for Preliminary Approval is set for November 14, 2025, and the hearing on the Parties'
13 Joint Motion for Preliminary Approval is set for December 18, 2025; and

14 WHEREAS, the Parties have been diligently working to finalize their settlement
15 agreement, Joint Motion for Preliminary Approval, and accompanying documents, and such
16 efforts would benefit from a brief amount of additional time to finalize the relevant filings.

17 NOW THEREFORE, subject to the Court's approval:

18 The Parties shall file the Joint Motion for Preliminary Approval by November 24, 2025.
19 The Joint Motion for Preliminary Approval shall remain noticed for hearing on December 18,
20 2025, at 1:30 p.m. in Courtroom 7 before District Judge Daniel J. Calabretta.

21
22 DATED: November 13, 2025

NICHOLAS & TOMASEVIC, LLP

23
24 By: /s/ Alex Tomasevic

ALEX TOMASEVIC

Attorneys for Plaintiffs

25 NICHIA LEASER, ATCHARA WONGSAROJ,
26 KATINA MAGEE and JOYCE EISMAN
27
28

1 DATED: November 13, 2025

COBLENTZ PATCH DUFFY & BASS LLP

2
3 By: /s/ Mark L. Hejinian

4 MARK L. HEJINIAN

5 Attorneys for Defendants

PRIME ASCOT, L.P.; PRIME ASCOT

6 ACQUISITION, LLC; PRIME/PARK LABREA

7 TITLEHOLDER, LLC; PRIME

ADMINISTRATION, LLC

8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

9
10 Dated: November 21, 2025

/s/ Daniel J. Calabretta

11 THE HONORABLE DANIEL J. CALABRETTA

12 UNITED STATES DISTRICT JUDGE